

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

NYEISHA S. GHEE,

Plaintiff,

Civil Action No.: 3:25-cv-17-RCY

v.

PINETREE APARTMENTS, LLC,

Defendant.

**PLAINTIFF'S UNOPPOSED MOTION TO EXTEND HER TIME TO
RESPOND TO DEFENDANT'S PARTIAL MOTION TO DISMISS AND
TO EXTEND THE DEFENDANT'S TIME TO FILE ANY REPLY AS WELL**

Plaintiff Nyeisha S. Ghee, by counsel, and with consent of the Defendant, respectfully moves the Court to extend her time for responding to Defendant's partial motion to dismiss by five days and to extend Defendant's time for filing a reply by three days.

On March 7, 2025, Plaintiff filed an amended complaint. ECF 24. On March 28, 2025, Defendant filed a partial motion to dismiss and accompanying memorandum. ECF 26 and 27. Plaintiff's memorandum in opposition to that motion must currently be filed by April 11, 2025, which would then make Defendant's reply due on April 17. One of Plaintiff's counsel is currently in the middle of a two-week federal trial and Defendant's period for filing a reply currently falls over the time of defense counsel's long-planned family vacation. Good cause therefore exists for the granting of the two short extensions.

Under the proposed extensions, Plaintiff's memorandum in opposition to Defendant's partial motion to dismiss would be due on April 16, 2025. And Defendant's reply would be due by April 25, 2025. Plaintiff Nyeisha S. Ghee respectfully asks this Court to extend the relevant deadlines as set out in the motion and the proposed order, attached as Exhibit 1.

Respectfully submitted,

NYEISHA S. GHEE

By: /s/ Danny Zemel
Counsel

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Certificate of Service

I hereby certify that on this 7th day of April 2025, I have electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all parties of record.

/s/ Danny Zemel
Danny Zemel (VSB#95073)